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## LATHAM & WATKINS LLP

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July 18, 2022

### VIA ECF

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Hayes, et al.*, 20 Cr. 500 (JGK)

Dear Judge Koeltl:

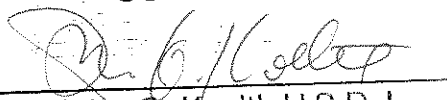
We respectfully submit this letter motion on behalf of our client Samuel Reed to request that the Court (1) exonerate bail and direct the Clerk of Court to return to Mr. Reed the \$500,000 that secured his appearance bond; and (2) direct Pretrial Services to return Mr. Reed's passport to him.

In compliance with the conditions of release set by the Court, Mr. Reed executed a \$5,000,000 appearance bond secured by \$500,000 deposited with the Court, and he surrendered his passport to Pretrial Services. (ECF No. 64.) The appearance bond provides that the bond shall be satisfied and the security released when the defendant reports to serve a sentence. *Id.*

On March 9, 2022, Mr. Reed entered a plea of guilty to Count I of the Indictment (ECF No. 2), and on July 13, 2022, the Court sentenced Mr. Reed to eighteen (18) months of probation and required him to pay a \$100 special assessment and report to the Probation Department within seventy-two (72) hours. Mr. Reed reported to the Probation Department on July 13, 2022 and paid the \$100 special assessment via money order on July 16, 2022. Accordingly, pursuant to the terms of the appearance bond, we request that the Court order the exoneration and release of bail and direct the Clerk of Court to return the \$500,000 deposit to Mr. Reed.

Additionally, Mr. Reed has satisfied the terms of his pretrial release, and we request that the Court issue an order directing Pretrial Services to return Mr. Reed's passport to him.

APPLICATION GRANTED  
SO ORDERED

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John G. Koeltl, U.S.D.J.

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We appreciate the Court's attention to these matters.

Respectfully submitted,

/s/ Douglas K. Yatter  
Douglas K. Yatter  
Benjamin Naftalis  
of LATHAM & WATKINS LLP

cc: AUSA Samuel Raymond